

BERLIE CATLIN MOORE
Plaintiff

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2007 JUN 28 A 10:45
CASE NO. 07-07-CV-195-ZD

✓
VIVIAN LANGFORD,
Defendants

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

RESPONSE IN OPPOSITION TO SUCH PLEADING

Comes Now the Plaintiff ^{of} BERLIE CATLIN MOORE
#340553 by and through himself & so do hereby sub-
mit the following Response in Opposition to the
Pleading of the Defendants.

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

BERLIE CATLIN MOORE, #240553

Plaintiff

vs

Case No. : 2:07-CV-195-ZD

DEVIAN LANGFORD ET AL.

Defendants

AFFIDAVIT OF BERLIE CATLIN MOORE

Before me, the undersigned Notary public in and for said STATE and County, personally appeared BERLIE CATLIN MOORE #240553, who after being duly sworn, deposed and said as follows:

1. My name is BERLIE CATLIN MOORE and I am an inmate at Frank Lee youth center serving a ^{9 months} period of incarceration. And I am over the age of twenty-one (21).

2. I am declared legally handicap, or Disabled by the Social Security Administration for an injury to my hand for which I completely lost my two outside fingers. This injury occurred in 1992. And has affected my writing hand, which limits my ability to do almost anything as is normal, for others to do that have all of their fingers. I don't have any control over why I am this way. And I did not drop out of the Basic College Prep Courses. But I enrolled in the Horizon program, attempting to obey the Court's Order. Which was to complete a vocational track. I didn't know at the time that my disability was going to be such an hindrance. I applied myself to the best of my physical ability, as best I could, with these limitations. To which neither of the Defendant's, Devian Langford or Debra Martin

Can understand, that I am limited in my hand to do certain
 task as, Normal inmates that has total hand functions. The
 Defendant are not Medically Inclined to understand this type
 of limitation of use of the hand. Neither do they care, they only
 have a desire to fullfill. Their obligations to their duties. If
 the Court could view my hand nothing is left to the imagination
 it's clear to see. That I am restricted in use almost entirely.
 What the Defendants should have done was notified the sentencing
 Judge. That it is not feasible for the Plaintiff, to comply with
 the Court order, to obtain a vocational trade. Because of Plaintiff
 Disability, but that special needs were going to be needed to
 assist the Plaintiff. And the Alabama Department of Corrections
 wasn't of liberty to provide this service. But in the future the
 Plaintiff could obtain help from Vocational Rehabilitation Service's
 in his hometown.

The above Information is true and correct to the best of my
 knowledge and belief.

X Berlie C Moore
 BERLIE CATLIN MOORE #240553

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS THE 26th
 DAY of June 2007

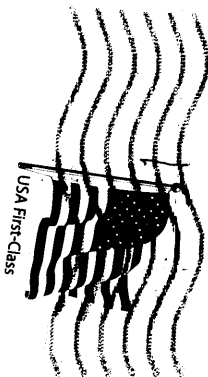
My COMMISSION EXPIRES 11/09/09 → Don't Shick
 NOTARY PUBLIC

RELIE C. MOORE #240553 DOA# B Bed# 13A
F.L.Y.C.
P.O. Box 220410
DEATSVILLE, AL 36022

Correspondence is in forward
in Alabama State Prison The content
have not been evaluated and the Alabama
Department of Corrections is not responsible
for the substance or content of the enclosed
correspondence

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